

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PAULA PAGONAKIS,)
)
Plaintiff,)
)
v.) NO. 1:06-CV-00027 (SLR)
)
EXPRESS LLC a/k/a)
LIMITED BRANDS, INC.,)
)
Defendant.)

**SECOND STIPULATION TO CONTINUE DISCOVERY,
DISPOSITIVE MOTION AND MOTIONS IN LIMINE DEADLINES**

1. Pursuant to Local Rule 16.5, Plaintiff Paula Pagonakis (“Plaintiff”) and Defendant Express LLC (“Defendant”) (collectively referred to hereinafter as the “Parties”) hereby agree and stipulate to a short extension of the discovery and dispositive motion deadlines and request approval from this Court.

2. The Parties stipulate to the following proposed extension of the case schedule:

- Discovery cut off: March 1, 2006
- Dispositive motion deadline: April 2, 2006

3. In terms of the remaining dates, the Parties’ understand that now that this matter has been transferred to Judge Sue L. Robinson, Judge Robinson may designate other dates per her own schedule, and the Parties obviously will abide by any dates Judge Robinson proposes for trial and the like.

4. Lead counsel for Plaintiff and Defendant certify that a copy of this request has been provided to their clients. *See* attached Exhibit A.

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J.

Dated: December 13, 2006

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PAULA PAGONAKIS,)
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Plaintiff,)
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EXPRESS LLC a/k/a)
LIMITED BRANDS, INC.,)
)
Defendant.)

LOCAL RULE 16.5 CERTIFICATION OF PLAINTIFF'S COUNSEL

Pursuant to Local Rule 16.5, I hereby certify that a copy of the *Stipulation To Continue Discovery, Dispositive Motion And Motions In Limine Deadlines* was sent to Plaintiff Paula Pagonakis.

s/ Gary W. Aber
One of the Attorneys for Plaintiff

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Defendant.)

LOCAL RULE 16.5 CERTIFICATION OF DEFENDANT'S COUNSEL

Pursuant to Local Rule 16.5, I hereby certify that a copy of the *Stipulation To Continue Discovery, Dispositive Motion And Motions In Limine Deadlines* was sent to Defendant Express, LLC's corporate representative.

/s/ Francis G.X. Pileggi
One of the Attorneys for Defendant